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July 6, 2020

**By Electronic Case Filing**

Hon. Philip M. Halpern  
United States District Court  
for the Southern District of New York  
United States Courthouse  
500 Pearl Street, Room 1950  
New York, NY 10007  
(914) 390-4160

**Re: *Kansas Gilleo v. The J. M. Smucker Company*, Case No. 7:20-cv-02519-PMH**

Dear Judge Halpern:

We write jointly on behalf of Plaintiff Kansas Gilleo and Defendant The J. M. Smucker Company (“Smucker”) in the above-referenced matter before this Court. Smucker sent a letter to Plaintiff pursuant to Rule 4(C) of your Individual Practices. Plaintiff responded and the parties conferred. During the parties’ meet and confer, the parties agreed that it would be beneficial and efficient for Plaintiff to file an Amended Complaint as envisioned by Rule 4(C)(ii) of your Individual Practices.

This letter seeks the Court’s approval of an agreed upon schedule for Plaintiff to file an Amended Complaint and Smucker to respond. Plaintiff will file an Amended Complaint by July 31, 2020. Smucker will then respond by September 29, 2020. The parties will follow Rule 4(C) of your Individual Rules should Smucker decide to file a motion to dismiss the Amended Complaint.

This proposed schedule will preserve resources, avoid duplicative motions, and streamline this litigation. For these reasons, the parties respectfully request that this Court approve the agreed upon schedule set forth in this letter

Respectfully Submitted,

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